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June 30, 2022

By ECF

Hon. James M. Wicks, U.S.M.J.
United States District Court
Eastern District of New York
100 Federal Plaza
Central Islip, New York 11722

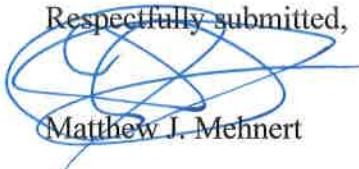
Re: **Volpe v. Ryder, et al.**
Docket No.: 19-cv-02236 (JMA)(JMW)

Dear Judge Wicks,

This office is counsel to Defendants County of Nassau, the Nassau County Police Department, Patrick Ryder, Russell Sacks and Joseph Massaro (collectively, "the Defendants") in the above-entitled action. Consistent with the Court's order during the May 18, 2022 status conference, I write on behalf of the parties to provide a status report.

Due to circumstances beyond our control relating to recent non-case related law enforcement developments, a date for the Commissioner's deposition has proven difficult to schedule. The parties are attempting to schedule same for the end of July or early August. While the Commissioner had earlier dates, those conflicted with prior court commitments for both counsel. As it relates to the issue of text messages, the County has located the physical device in question, has copied the text messages and I am in the process of producing same to Plaintiff's counsel. Finally, with regard to the issue of expert witnesses, the parties do not anticipate any need for expert discovery.

The Court's continued attention to this matter is greatly appreciated.

Respectfully submitted,

Matthew J. Mehnert

cc: Gina Arnedos, Esq.